

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

5G IP HOLDINGS LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO. LTD.,
SAMSUNG ELECTRONICS AMERICA,
INC., AND SAMSUNG RESEARCH
AMERICA,

Defendants.

Civil Action No. 4:21-cv-00622-SDJ

Hon. Sean D. Jordan

JURY TRIAL DEMANDED

**JOINT MOTION TO AMEND THE SCHEDULING ORDER
(DKT. NO. 33) RELATING TO CLAIM CONSTRUCTION**

Plaintiff 5G IP Holdings LLC (“5GIP”) and Defendants Samsung Electronics Co. Ltd., Samsung Electronics America, Inc., and Samsung Research America (collectively, “Samsung”) (5GIP and Samsung collectively, the “Parties”), respectfully jointly move to amend the Scheduling Order (Dkt. No. 33) to adjust the deadlines associated with claim construction briefing and pre-hearing activity. As explained below, good cause exists for the amendments, which will not affect any of the other deadlines.

The Parties respectfully request that the Court amend the filing deadlines for claim construction briefing, technology tutorials, and the joint claim construction chart. Good cause exists for these amendments based on the Court’s adjustment to the claim construction hearing date. Specifically, the Parties believe it would be beneficial to amend these dates to move them closer to the adjusted hearing date to ensure the issues are fresh for argument and to give the Parties more

time to confer regarding the disputed claim terms before the hearing. Considering these circumstances, the Parties respectfully submit that there exists good cause for the proposed amendments.

Thus, the Parties respectfully request that the Court amend the Scheduling Order to adjust the filing deadlines for claim construction briefing, technology tutorial, and the joint claim construction chart. The table below shows the proposed changes to the current deadlines.

Proposed Amended Deadlines

Current Dates	Parties' Proposed Dates	Event
Wednesday, May 25, 2022	Wednesday, June 1, 2022	Opening claim construction brief (P.R. 4-5(a))
Wednesday, June 15, 2022	Wednesday, June 29, 2022	Responsive claim construction brief (P.R. 4-5(b)).
Wednesday, June 29, 2022	Wednesday, July 13, 2022	Reply claim construction brief (P.R. 4-5(c)).
Tuesday, June 21, 2022	Wednesday, July 27, 2022	Submit technology synopsis/tutorial (both hard copy and disk)
Friday, July 1, 2022	Friday, July 29, 2022	Parties to file joint claim construction chart (P.R. 4-5(d)). Parties shall work together to agree on as many claim terms as possible
Wednesday, August 10, 2022	No Change.	Claim Construction hearing 1:30 PM, U.S. Courthouse, 7490 Preston Road, Plano, TX 75024

A proposed order is being submitted with this motion for the Court's consideration.

Dated: May 17, 2022

Respectfully Submitted,

By: /s/ Deepa Acharya (with permission)

By: /s/ Alan M. Fisch

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Attorneys for Plaintiff
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*Counsel for Samsung Electronics Co., Ltd.;
Samsung Electronics America, Inc.; and
Samsung Research America*

CERTIFICATE OF SERVICE

I certify that on May 17, 2022, I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Eastern District of Texas, via the CM/ECF system, which will send notice to all counsel of record who have consented to service by electronic means.

/s/ Alan M. Fisch
Alan M. Fisch

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7, I certify that counsel for the parties conferred regarding this motion and the relief is jointly requested.

/s/ Alan M. Fisch
Alan M. Fisch